

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

STATE OF KANSAS, et al.,

Plaintiffs,

V.

THE UNITED STATES DEPARTMENT OF
LABOR, et al.

Defendants.

Civil Action No. 2:24-cv-76-LGW-BWC

MOTION TO INTERVENE

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure Rule 24, Movants CENTRO DE LOS DERECHOS DEL MIGRANTE (CDM), CANDELARIO RODRIGUEZ SERRANO, and JORGE SÁNCHEZ REYES by and through their undersigned counsel, move this Court for an Order permitting them to intervene as Defendants in this above-captioned lawsuit. This Motion is based upon the reasons set forth in the accompanying memorandum of law, and the supporting declarations of CDM Executive Director Rachel Micah Jones, Mr. Rodriguez, and Mr. Sánchez. In addition, copies of Movants' proposed answer and proposed memorandum of law in opposition to the pending motion for a preliminary injunction are attached as exhibits.

Movants’ counsel has conferred with the parties. Plaintiffs’ counsel advised that “Plaintiffs oppose the motion to intervene but would not oppose the proposed intervenors submitting an amicus brief for the court's consideration.” Defendants’ counsel advised that Defendants “take no

position on the motion to intervene at this time, but [] reserve the right to file a response, including a response in opposition.”

Respectfully submitted this 5th day of July 2024.

Adam R. Pulver
DC Bar No. 1020475
(*pro hac vice* motion forthcoming)
Public Citizen Litigation Group
1600 20th Street NW
Washington, DC 20009
(202) 588-1000
apulver@citizen.org

s/ Daniel Werner
Daniel Werner
Ga. Bar No. 422070
Radford Scott LLP
315 W. Ponce de Leon Ave., Suite 180
Decatur, GA 30030
(678) 271-0304
dwerner@radfordscott.com

Counsel for Proposed Intervenor-Defendants